

RICHARD QUATTLEBAUM V. THE BOEING COMPANY  
C/A No. 2:14-cv-03664-DCN-MGB

**DEFENDANT'S MOTION AND MEMORANDUM IN SUPPORT OF  
ITS MOTION FOR SUMMARY JUDGMENT**

# **EXHIBIT “A”**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF SOUTH CAROLINA  
                    COUNTY OF CHARLESTON

3 RICHARD QUATTLEBAUM,

4 Plaintiff,

5 vs. CASE NO. 2:14-cv-3664-DCN-MGB

6 THE BOEING COMPANY,

7 | Defendant.

9 DEPOSITION OF: RICHARD QUATTLEBAUM

10 DATE: July 8, 2015

11 TIME: 10:54 AM

12 LOCATION: Nexsen Pruet, LLC  
205 King Street, Suite 4  
13 Charleston, SC

14 TAKEN BY: Counsel for the Defendant

15 REPORTED BY: MARIE H. BRUEGGER, Registered  
Professional Reporter, CRR

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A. WILLIAM ROBERTS, JR., & ASSOCIATES

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1 company processes and systems, correct? 22  
2 A. Yeah.  
3 Q. So you knew that Force Protection took  
4 the position that you were terminated?  
5 A. Yeah.  
6 Q. When you first went to work for  
7 Boeing, what was your position?  
8 A. I was a Class -- I guess you could say  
9 a Class A assembler.  
10 Q. Were you an A assembler the entire  
11 time you were with Boeing?  
12 A. No.  
13 Q. When did that change?  
14 A. That changed -- well, after you finish  
15 school, I think in about six months -- six months  
16 to a year of service, I think, you become a B  
17 mechanic.  
18 Q. And did you become a B mechanic?  
19 A. Yes.  
20 Q. And were you a B mechanic the  
21 remainder of your employment with Boeing?  
22 A. Yes.  
23 Q. You said after school. Is that an  
24 internal Boeing school?  
25 A. Yes.

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1 A. The hours changed, but not the shift.

2 Q. So you stayed on second shift the  
3 entire time you were there?

4 A. Yes.

5 Q. Did your supervisor change?

6 A. Yes. They rotate every six months, or  
7 something like that.

8 Q. After Jackie Bauknight, who was your  
9 next supervisor?

10 A. What was it? Catherine. They called  
11 her Cat.

12 Q. Is that Cat Alford-Myers?

13 A. Yes, that's who, yeah.

14 Q. And how long do you recall did she  
15 stay your supervisor?

16 A. Well, when I -- when I went in -- when  
17 I went on medical leave, Cat was my supervisor.

18 Q. She was. And that would have been  
19 August of 2012?

20 A. Yes.

21 Q. So is it fair to say that Jackie  
22 Bauknight and Catherine Alford-Myers were your  
23 supervisors while you worked at Boeing?

24 A. Yes.

25 Q. Any other supervisors?

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1 Q. Was she voted out?

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2 A. I don't know. I was out on medical  
3 leave, and I never returned back to Boeing.4 Q. And I'm going to ask you just one more  
5 time. Can you think of anything else that she did  
6 that you considered to be nit-picking and  
7 harassment?8 A. I've got that in the back of my head.  
9 I'm trying to think of some things now.10 Q. If you think of anything during your  
11 deposition, stop and let me know what those are.

12 A. Okay.

13 Q. You went and talked to Catherine  
14 Alford-Myers. You talked to her supervisor, Art,  
15 and what was Art's last name?

16 A. Washington, I think.

17 Q. Washington. Who else did you talk to  
18 about this? You said you went to HR.

19 A. Yes, Cojohna Rice.

20 Q. Was she your HRG, your HR person?

21 A. At the time, yes.

22 Q. And what did you tell Cojohna Rice?

23 A. That I was being harassed, and that I  
24 didn't get any response out of Cat or Art  
25 Washington, and that I was considering treatment

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1 for anxiety, work-related stress.

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2 Q. You said you were considering it, or  
3 you were -- what did you say about treatment and  
4 anxiety, just then what you said?

5 A. That I was going out to get treatment.

6 Q. That you were going out to get  
7 treatment, okay. You told Cojohna Rice that?

8 A. Yes.

9 Q. What was her response?

10 A. Her response was: Great. I'm  
11 100 percent behind you, and I'll be here, you  
12 know, to support and help you.

13 Q. And did she actually send you over to  
14 Resa Mason?

15 A. Could have been vice versa. I don't  
16 know. I think she did. I think she did. I'm  
17 not -- I'm not sure how exactly that translated,  
18 you know, but I was introduced to Cojohna -- I  
19 mean to Resa Mason, and she was, you know, an  
20 evaluation for Boeing.

21 Q. Do you know when you first talked with  
22 her?

23 A. I don't remember that. I think I  
24 remember the conversation, that I was at work, and  
25 I was having an anxiety attack, and I called her,

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1 and she got me to drive over to the Palmetto  
2 Behavior Health Center.

3 Q. So you were still at work when you  
4 first talked to her?

5 A. Yes.

6 Q. Talked to Resa Mason?

7 A. Yes.

8 Q. And when you told her you were having  
9 anxiety and all, what did you say to her?

10 A. Quote?

11 Q. Yeah. What do you remember telling  
12 her, what kind of anxiety? Did you tell her what  
13 the issue was?

14 A. Yeah, I told her what the issue was.

15 She knew what the issue was.

16 Q. So what did you tell her?

17 A. I told her what the issue was.

18 Q. Tell me what the issue was.

19 A. I was being harassed and stressed out  
20 on the job.

21 Q. Did you tell her you were angry?

22 A. Yes.

23 Q. Did you tell her that you were having  
24 thoughts of injuring or harming your lead?

25 A. Yeah.

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1 Q. Was that Joy? 45

2 A. Yes.

3 Q. And were you having those thoughts?

4 A. Yeah. It went on for over a month,  
5 and, you know, you back a rat into a corner, he  
6 going to fight.

7 Q. When did you first have feelings of  
8 being concerned that you were going to harm or do  
9 something to Joy?

10 A. Well, after it persist about three  
11 weeks, and I didn't -- I couldn't get any response  
12 from -- no help from either Cat or Art.

13 Q. Did you ever take any action to harm  
14 her, to do anything?

15 A. No, no, no.

16 Q. Did you consider taking action?

17 A. It was a thought.

18 Q. And tell me what -- explain to me what  
19 that thought was.

20 A. It was a thought.

21 Q. That you would do what?

22 A. Well, I would --

23 Q. I mean, was there a specific, that you  
24 would hit her or that you would -- what were you  
25 concerned about doing?

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1           A. No. It was just basic anger. You  
2 know, it could have been a thought of choking her  
3 or hitting her or something like that. I mean, to  
4 be honest, it was very --

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5           Q. Did you consider it to be serious?

6           A. Yes, I did. That's why I got  
7 treatment.

8           Q. So you told Resa this, and Resa sent  
9 you to Palmetto Behavioral Health, correct?

10          A. Right, yeah.

11          Q. Did you talk with anyone else about  
12 this at Boeing before going to Palmetto Behavioral  
13 Center?

14          A. No, no.

15          Q. So it was Resa, you talked with  
16 Cojohna?

17          A. Yeah.

18          Q. And you talked with your supervisor,  
19 Catherine Alford-Myers?

20          A. Yeah. None of the -- none of the  
21 employees, none of those, no.

22          Q. Did you talk with anybody else  
23 in-house at Boeing?

24          A. No.

25          Q. Was there any physician or anybody

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1 else other than Resa?

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2 A. No.

3 Q. So when you went to Palmetto  
4 Behavioral, who was your -- did you go into like a  
5 six-week program?

6 A. I think it was a six-week program.

7 Q. And what did that program involve?

8 A. It involves a lot of counseling and a  
9 lot of stuff with self-esteem, you know, how to  
10 deal with stress.

11 Q. Was it a situation where you could  
12 come and go, or did you stay there in that  
13 program?

14 A. It was a -- it was a situation where I  
15 come and go. I had to meet there every morning at  
16 I think it was like 8:30, 9:00, something like  
17 that, and spend all day.

18 Q. I have in the records that your last  
19 day of working was August 21st, 2012. Does that  
20 sound right?

21 A. Yeah, that sounds about right.

22 Q. So when you told Resa and told Cojohna  
23 you needed to take some leave, did you then take  
24 some action to apply for that lead?

25 A. I contacted Aetna.

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1 Q. You contacted Aetna. Now, how did you  
2 contact Aetna?

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3 A. Through a phone conversation, I mean.

4 Q. Are you familiar with Total Access?

5 A. Yeah.

6 Q. Did you go through Boeing's Total  
7 Access program to contact Aetna?

8 A. Yes.

9 Q. Explain to me what Total Access is.

10 A. It ain't what it says, I'll tell you  
11 that. It's not really total access. It's  
12 supposed to be a link between you and Aetna and  
13 FMLA (sic).

14 Q. FMLA?

15 A. Yeah. That's supposed to be your  
16 chain of command.

17 Q. So you go into Total Access and put in  
18 the lead dates that you need?

19 A. Yes, and they sent -- they mailed me  
20 the paperwork, and I get the paperwork to the  
21 providers, and then the providers fill the  
22 paperwork out, and I send it back to them.

23 Q. And are you putting that paperwork in  
24 through Total Access, or are you mailing it back?

25 A. I'm mailing it back.

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1 Q. You're mailing it back?

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2 A. Yeah, because I don't have a home  
3 computer, so everything is really generated by  
4 mail.5 Q. When you contact Aetna, how do you go  
6 about doing that? How do you know the number to  
7 call at Aetna?8 A. Well, I go through the Total Access  
9 number, and it's a mess.

10 Q. To get in touch with Aetna?

11 A. Yes.

12 Q. Now, why do you say it was a mess?

13 A. Because Aetna put you between your  
14 provider, you, and Aetna. Aetna gives me the  
15 paperwork to give to the provider. If the  
16 provider don't understand the paperwork, he  
17 contacted me, and I'm between -- you see where I'm  
18 going with this? I'm between the provider and  
19 Aetna, and I got to translate -- because a lot of  
20 times I ran into a problem where the doctor didn't  
21 fill out the paperwork correctly, and he didn't  
22 fill it out on time to get it back to them on  
23 time, and it was a mess.24 Q. So you are responsible for getting  
25 that paperwork back in?

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1           A. Yes, yes. I got to like: Doc, I need       50  
2 this. I need this. I need this. I need this,  
3 Doc. I'm going to lose my job. I need this. I  
4 need this paperwork filled out today. I got to  
5 have it. And he like got like other clients and  
6 other things that he got to do, and he like trying  
7 to -- it was a mess.

8           Q. Aetna would give you certain deadlines  
9 to have the information back in?

10          A. Right, right, right. And as soon as I  
11 get them in the mail, I send them to the doctors,  
12 tell the doctor: Look, I got to get this back.  
13 I've got to have this.

14          Q. Because if you don't get it back on  
15 time, you may be terminated?

16          A. Yeah, yeah. It's on me, you know, and  
17 I'm stuck here saying: I need this paperwork back  
18 or I'm going to get terminated, but I can't make  
19 these people do this. I'm already in treatment.  
20 I'm already in treatment for stress. So, I mean,  
21 the deadline's tomorrow, and he's still got the  
22 paperwork. Ain't nothing I can do. It was a  
23 mess.

24          Q. Let me back up and ask you a question.  
25 Did you receive any treatment for depression or

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1 anywhere else, where you said: I'm so angry, I  
2 may hurt -- I'm having these feelings. I may hurt  
3 or harm this individual.

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4 A. To be all fairness and to answer your  
5 questions, you get mad every day in life, and, you  
6 know, I just -- you know, I just try to balance  
7 it.

8 Q. So I'm going to take that as a yes,  
9 that you have, but you just try to balance it.

10 A. Yeah. You got to balance it, you  
11 know.

12 (DFT. EXH. 5, 9/24/12 Treatment Record  
13 of Dr. Burke [SBH\_000006], was marked for  
14 identification.)

15 BY MS. BLACKBURN:

16 Q. Let me show you Defendant's Exhibit 5.

17 Now, you were treated by William  
18 Burke, Dr. Burke, correct?

19 A. Yes.

20 Q. Was that when you came out of Palmetto  
21 Behavioral?

22 A. Yeah. That's my -- that's my -- that  
23 was like my out of treatment provider, and that  
24 was a disaster.

25 Q. Did Palmetto refer you to Dr. Burke?

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1 A. Yes.

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2 Q. And I believe Susan Crocker also in  
3 his office, correct? Do you remember seeing her?

4 A. Who?

5 Q. Susan Crocker, Dr. Crocker. Did you  
6 ever see her?

7 A. Yes, yes, yes, yes. I remember  
8 Dr. Crocker, yes, yes.

9 Q. And you saw Dr. Burke several times,  
10 right?

11 A. Yes, yes.

12 Q. I'm going to show you Defendant's  
13 Exhibit 5, and these are some notes from his  
14 office. Why don't you look at the first three  
15 paragraphs to start off with. Have you read that?

16 That very first paragraph, where it  
17 says that: When asked what was the reason for his  
18 referral, he stated: I don't like talking about  
19 it. I feel like I've been the victim of  
20 prejudice, but no one at Boeing will listen to me.  
21 I admit that I had some bad thoughts, like any  
22 animal that is cornered. They said I was goofing  
23 off on my job and leaving work. I told my boss  
24 that this little dyke is lying about me.

25 Do you recall saying that to him?

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1 we was trying very hard to get in contact with her  
2 to see what it would take for me to come back to  
3 work, because I'd need a medical clearance to come  
4 back to work.

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5 Q. You did need a medical clearance to  
6 come back to work?

7 A. Yes.

8 Q. Now, during this time, were you also  
9 in touch with Aetna and getting the paperwork from  
10 Aetna and sending paperwork to Aetna?

11 A. All the paperwork that I got, I gave  
12 it to Dr. Burke. Somehow or another, it got  
13 screwed up. I got the blame for it because I'm  
14 the victim. I'm the lowest man on the totem pole.  
15 I couldn't -- you know, like Dr. Burke said he  
16 was -- he was like confused. He said: They keep  
17 asking me -- he was complaining to me about the  
18 paperwork that -- actually, Dr. Burke, he said:  
19 They keep asking me the same thing over and over.  
20 And I said: Well, Doc -- he say Aetna -- you  
21 know, it was crazy.

22 And I was stuck in between Dr. Burke  
23 and Aetna, and somehow or another, it didn't add  
24 up. I mean, I got to the point where Dr. Resa  
25 Mason was my only contact with Boeing. Between

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1 on the road for me to go back to work.

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2 I spoke with Dr. Tillsman.

3 Q. Tiechner?

4 A. Yes, yes, yes. I paid about \$160 out  
 5 of my pocket to see this doctor. He gave me an  
 6 evaluation test that took about an hour. He  
 7 didn't understand why -- because I think where the  
 8 problem came in at, Dr. Resa Mason -- I think  
 9 where this came in at, Dr. Resa Mason, she was my  
 10 only, you know, direct contact from Boeing, and  
 11 she was in contact with my doctors, and she was --  
 12 I think where we got to this point, she was  
 13 like -- wanted a second opinion from Dr. Burke.

14 Q. To the best of your recollection,  
 15 though, was Dr. Burke still recommending anger  
 16 management in November of 2012?

17 A. Yes, yes.

18 (DFT. EXH. 9, 12/5/12 Letter to Resa  
 19 Mason from Dr. Crocker and Dr. Burke [SBH\_000010],  
 20 was marked for identification.)

21 BY MS. BLACKBURN:

22 Q. Let me show you Defendant's 9, which  
 23 is a letter from Dr. Burke and Dr. Crocker. I'll  
 24 give you a minute to look at that letter.

25 A. I think this Dr. Farrell, I think he

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1 them, I told them that that was out of network,  
2 when they sent me to that doctor, he was out of  
3 network, and I had to pay for it out of my own  
4 pocket. You know, that hurt.

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5 Q. So that fitness for work evaluation  
6 you did not have done?

7 | A. No.

8 (DFT. EXH. 10, 12/14/12 Clinician  
9 Notes of Dr. Burke [SBH-000002], were marked for  
10 identification.)

11 BY MS. BLACKBURN:

12 Q. And then let me just show you the next  
13 exhibit, which is Exhibit 10, some notes back from  
14 Dr. Burke, and this, I think, says: Patient  
15 represented he went to Dr. Tiechner -- I'm not  
16 sure how you pronounce it -- for evaluation, and  
17 that he cleared him to work, and then it says: I  
18 spoke with Dr. T, and he stated he didn't complete  
19 exam. He stated he would not pay for the expense.

20 So is that that you would not pay for  
21 that -- or patient stated that he would not pay  
22 for the expense. That's the expense for that  
23 fitness for work evaluation?

24 A. Yeah, but he gave me an initial test.  
25 He gave me a test, and I took a test in his

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1 office.

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2 Q. And then he says, when he refers to  
3 this he could not pay for the exam, it says: I  
4 stated that this was the only way to return to  
5 work. Did you understand that having that fitness  
6 evaluation was the only way to return to Boeing?

7 A. No.

8 Q. You didn't?

9 A. No.

10 Q. Do you recall Dr. Burke telling you:  
11 I stated that this was the only way you could get  
12 back to work, to have that evaluation?

13 A. No, no. Like I say, Dr. Resa Mason,  
14 we was following her orders. I mean, Dr. Burke  
15 and them, they can't tell me what I need to go  
16 back to work, I don't think, because I need to do  
17 what Boeing says to come back to work.

18 Q. And Dr. Mason was saying you needed  
19 that fitness evaluation.

20 A. I guess in the end, she did, I mean,  
21 but at that point, who's going to pay for it?

22 (DFT. EXH. 11, 1/14/13 Clinician Notes  
23 of Dr. Burke [SBH\_000001], were marked for  
24 identification.)

25 BY MS. BLACKBURN:

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1       this, and I'm going to give you a call about a  
2       week later. He gave me a phone call about a week  
3       later, and he just said I was terminated. That's  
4       the end of the story.

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5           Q. Did he tell you why you were  
6       terminated?

7           A. Yeah. Well, he explained that I  
8       missed too many days out of work. I said: Well,  
9       I mean, I'm sitting here waiting on medical  
10      clearance to come back to work. I said: I got  
11      vacation time. I said: It wouldn't have been no  
12      problem for me to use two or three days of my  
13      vacation time to cover this time for me to get  
14      back to work, but I'm thinking that the paperwork  
15      was cleared for me to be out to that date, and on  
16      that date that I thought I was cleared, he said  
17      that I was terminated, so --

18           Q. Did you understand you were cleared,  
19       and we're going to look at some of Aetna's  
20      documents, but through January 13th?

21           A. Yeah, January 13th or the 14th, I  
22       think, something like that, I mean, I supposed to  
23       been cleared, but --

24           Q. I believe January 13th -- your leave  
25       was through January 13th, and January 14th, you

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1        were expected to be back to work, unless you  
2        submitted some additional requests or paperwork.

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3            A.     Right, right.

4            Q.     Was that your understanding?

5            A.     Yeah, that's my understanding.

6            Q.     When you talked to Michael, was it  
7        after January 13th or 14th?

8            A.     I think it was.

9            Q.     Was it in January?

10          A.     But it was in January.

11          Q.     But the deadline for submitting the  
12        paperwork had already passed?

13          A.     I think so.

14          Q.     Did he tell you anything about you  
15        didn't get the paperwork in, so your employment's  
16        been terminated?

17          A.     No. He didn't explain -- he didn't  
18        explain to me the reason why. I'm saying: Hey, I  
19        got almost 70 hours of vacation time here, I mean,  
20        come on, three days.

21          Q.     Now, let me ask you this: You  
22        initially took Family and Medical Leave Act leave,  
23        correct?

24          A.     Correct.

25          Q.     And did you understand that was 12

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1 weeks of leave under the Family and Medical Leave  
2 Act?

3 A. Yeah, yeah, yeah.

4 Q. So when you went out in August of  
5 2012, the family and medical leave ran for 12  
6 weeks?

7 A. Right.

8 Q. And then following that, you were out  
9 on additional leave, but it wasn't family and  
10 medical leave. Was that your understanding?

11 A. Yes.

12 Q. So you had exhausted all of your FMLA  
13 leave?

14 A. Yes.

15 Q. And then you were given additional  
16 leave through Aetna after that?

17 A. But the question that I had the whole  
18 time I was out on leave, I never receive any pay.  
19 I was approved for time out, but I never receive  
20 any pay.

21 Q. Right. Did you understand that FMLA  
22 leave was unpaid?

23 A. No.

24 Q. And then after the FMLA pay leave, you  
25 were out on additional leave with Aetna,

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1 and stating whether there was any documentation or  
2 deadline that you had?

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3 A. Yes.

4 Q. So this particular letter, for  
5 example, it says: Dear Mr. Quattlebaum, your  
6 action is required, and it then refers to your  
7 claim for disability?

8 A. Yeah, but it's not really my action;  
9 it's my provider action. Well, their provider --  
10 they got these providers in their network. These  
11 are doctors they referred me to see.

12 Q. Who, that Boeing did?

13 A. Yes.

14 Q. Who was that?

15 A. Providers. I mean, they give you a  
16 list of providers that's in the network.

17 Q. But you understood, didn't you, that  
18 it was your responsibility to get the paperwork  
19 back to Aetna?

20 A. Yes.

21 Q. And this particular letter shows your  
22 last date of work is 8/21/12?

23 A. Yes.

24 Q. That was the last date you worked at  
25 Boeing?

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1 A. Yes.

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2 Q. Did you ever come back into the  
3 facility at all following August of 2012?

4 A. No.

5 Q. You never had any meetings at Boeing  
6 or came back to Boeing for anything?

7 A. The closest -- I was not allowed on  
8 the premises. The closest I got back to the  
9 company was I was at the visitor center when I met  
10 with Dr. Resa Mason.

11 Q. When did that occur?

12 A. That had occurred back on that  
13 Thursday you said that she had that -- yes, that  
14 two --

15 Q. January of 2013?

16 A. Yes, yes. That's the date -- that's  
17 the last time I been on the Boeing property was  
18 when I met with her at the visitor center, because  
19 I was not allowed on the premises, honestly.

20 (DFT. EXH. 14, Letters to Deponent  
21 from Aetna [AETNA 000307 to -11, 000044 to -47,  
22 000051 to -57, 000312 to -15, 000149, 000061,  
23 000062, 00064, 000065, 000067, 000068, 000072 to  
24 -78, 000080, 000083 to -89], were marked for  
25 identification.)

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1 events and leave section. This looks like  
 2 additional information on just how to complete  
 3 your leave, and this was sent to you December 3rd,  
 4 2012. It's got a behavioral clinician statement  
 5 attached. Does that look familiar?

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6 A. Yes.

7 (DFT. EXH. 16, 12/14/12 Letter to  
 8 Deponent from Aetna [AETNA 000317], was marked for  
 9 identification.)

10 BY MS. BLACKBURN:

11 Q. Then the next exhibit, which is  
 12 Exhibit 16, from Aetna, this letter states: Based  
 13 on Aetna's review of the medical information  
 14 submitted with your claim, we did not find that it  
 15 sufficiently documented your level of impairment  
 16 preventing your ability to work, and then it goes  
 17 down to the next paragraph and says: Aetna must  
 18 have all the requested clinical information prior  
 19 to 1/14/2013.

20 Do you recall getting this letter?

21 A. Yes, and I gave it to Dr. Burke. This  
 22 is the link between Aetna and Dr. Burke, and I'm  
 23 caught in the middle here.

24 (DFT. EXH. 17, 12/17/12 Letter to  
 25 Deponent from Aetna [AETNA 000095 to -96], was

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1 information, and this says short-term disability,  
2 so at this point in time, you're on short-term  
3 disability leave, correct?

4 A. Correct, yes.

5 Q. Your FMLA leave had expired or run  
6 out. You had exhausted all of it back in 2012?

7 A. Right.

8 Q. And it says in the second paragraph:  
9 Aetna must have all the requested clinical  
10 information prior to January 14th, 2013. If we do  
11 not receive the information requested, your claim  
12 may be denied for insufficient clinical  
13 information.

14 Were you aware that was Aetna's  
15 position, they needed this information by  
16 January 14, 2013?

17 A. Yes. Like I say, I'm caught between  
18 Aetna and the provider, Dr. Burke. Dr. Burke, I  
19 got to have this paperwork. He reading the same  
20 thing I'm reading. Now what am I to do? Give the  
21 paperwork to Dr. Burke and pray to God that he get  
22 it out on time, that's all I can do.

23 You know, I'm not denying any of this.  
24 I mean, your provider have to be in link with  
25 everything else, and ain't nothing I can do. I

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1 can just -- I know Aetna say that I have to, but  
2 it's not really up to me. It's up to the provider  
3 to get the letters back out on time. It got very  
4 frustrating.

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5 (DFT. EXH. 20, Letters to Deponent  
6 from Aetna [AETNA 000105, 000106, 000318, 000319,  
7 and 000107], were marked for identification.)

8 BY MS. BLACKBURN:

9 Q. These are the last three letters that  
10 I'm going to show you from Aetna, Defendant's  
11 Exhibit 20, and do you recall receiving these  
12 letters?

13 A. Yes.

14 Q. Now, this last letter that's part of  
15 Exhibit 20, which is dated 1/15/2013, that is the  
16 letter that states your benefits have been denied.  
17 Do you recall receiving that?

18 A. Yes.

19 Q. This states that on December 28th,  
20 2012, your short-term disability claim was  
21 suspended to allow for the submission of requested  
22 clinical form from your provider, Dr. Burke. The  
23 clinical information was requested from Dr. Burke  
24 via fax on 12/21/12. The clinical was due no  
25 later than 1/14/2013. As of 1/14/2013, the

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1 he was my HR representative.

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2 Q. And then when did she call you back  
3 and tell you Michael would call you?

4 A. That Thursday after she had a meeting  
5 with Michael.

6 Q. And she said Michael would call you,  
7 and then when did Michael call you?

8 A. Michael called me about a week later.

9 Q. And told you what, that you were  
10 terminated?

11 A. I was terminated.

12 Q. Now, when he called you, was it after  
13 January 14th, 2013?

14 A. I think so.

15 Q. So January 14th, 2013, came and went,  
16 and you did not get in any paperwork to Aetna,  
17 right?

18 A. No.

19 Q. And you didn't come back to work?

20 A. Right.

21 Q. Mr. Quattlebaum, there's some notes  
22 from Value Options, which is Resa Mason, produced  
23 in the case, and just for reference, this is Bates  
24 No. VO42. And on December 7th, 2012, she said she  
25 spoke with you and informed you of the